



DUNLAP & KYLE CO., INC.

• P. O. Box 720 • Batesville, MS 38606

Phone 662-563-7601 • FAX 662-563-0019

Wholesale Tire Distributors • Serving the South since 1930

July 9, 2007

George H. Person, Chief
Recall Management Division
Office of Defects Investigation

Dear Mr. Person,

I spoke with Willard on July 5, 2007 about the tires in question. Mr. Willard informed me that our company (Dunlap & Kyle CO., Inc.) was included on a database provided by U.S. customs showing us to be an importer of tires from Hangzhou Zhongce Rubber Co. Ltd. I believe the information in that database is incorrect. Attached is an invoice for Alexander for the entry, duties and freight for container TTNU9050525, the commercial invoice for that same container, the arrival notice the references that same container and commercial invoice and the U.S Customs entry summary that references the commercial invoice.

The tires on this commercial invoice are not manufactured by H.Z. They are manufactured by Beijing Tyre Factory. I am enclosing a photo of the tire, which shows the same model number referenced on the invoice and the D.O.T. number on the tire. The D.O.T. number begins with OJ, which is the code for Beijing Tyre Factory. Lastly on the arrival notice you will see the port of loading is Xingang. HZ would have been Hangzhou, which is several hundred miles away from Xingang.

Please let me know if you have any other questions or need any more information.

Sincerely,

Dennis King
V.P. Operations
Dunlap & Kyle Co., Inc.

1. Please identify by brand, model name and size all light truck radial tires produced by HZR that are the same size as any of the tires identified on page 1 of this letter, and which were imported into the United States by your company between January 2001 to present, that your company sold or otherwise distributed in the United States. These tires are referred hereinafter as "similar tires."

Answer: NONE

2. If your company does not agree with the statement made in the enclosed report by FTS that your company imported tires manufactured by HZR that are similarly constructed and of the same size as those identified by FTS, and if your company does not believe that those similar tires contain a safety-related defect, please provide an explanation for your company's position.

Answer: ENCLOSED

3. Separately, for each tire line identified as similar tires above, state quantity of, and the range of TINs, for those tires that your company sold to wholesalers, retail distributors or dealers, or to the general public through individual sales.

Answer: NONE

4. As to all similar tires that you have identified in response to request No. 1 above, please provide the following information:
 - a. Identify by contact name, address and phone number each wholesaler, retail distributor or dealer, and individual member of the general public to whom your company directly sold or otherwise distributed any of the similar tires. Provide the number of tires sold or otherwise distributed to each, separately identified by brand name and size.

Answer: NONE

- b. Provide a copy of each tire registration form (see 49 C.F.R. part 574) and comparable information (e.g., data bases and files with names of tire purchasers (not for resale)).

Answer: NONE

5. State whether or not your company imported and sold tires bearing the manufacturing code "FTS" in the TIN.

Answer: NO

6. State, with respect to the tires identified in response to Request No. 1 above, by tire brand name, model, tire size and year of manufacture, the number of each of the following, received by your company, or of which your company is otherwise aware, which relate to, or may relate to tread separation, blowout or belt to belt separation in the similar tires that you imported:
- a. Reports involving a crash, injury, or fatality, based on claims against your company and/or HZR involving a death or injury, notices received by your company or HZR alleging or proving that a death or injury was caused by a possible defect in a subject vehicle;
 - b. Property damage claims;
 - c. Warranty adjustments;
 - d. Complaints, including those from fleet operators;
 - e. Third-party arbitration proceedings where your company is or was a party to the arbitration; and,
 - f. Lawsuits, both pending and closed, in which your company is or was a defendant or codefendant.

Answer: NONE

For subparts "a" through "f," state the total number of each item (e.g., fatality reports, property damage claims, warranty adjustments, etc.) separately. Multiple incidents involving the same tire are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a property damage claim and warranty adjustment involving the same incident in which a crash occurred are to be counted as a property damage claim and a warranty adjustment).

In addition, for items "a" through "f," provide a summary description of the alleged problem and causal and contributing factors and your company's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "e" and "f," identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

7. Produce copies of all documents related to each item within the scope of your response to Request No. 6, including, but not limited to, received complaints and warranty adjustment claims. Describe the search method used by your company in identifying these documents. Organize the documents separately by category (i.e., fatality, property damage claims, warranty adjustments, etc.) and describe the method your company used for organizing the documents.

Answer: N/A

8. Describe all testing that your company conducted, arranged to have conducted (e.g., by a test laboratory) and/or that your company otherwise relied on in certifying that each of the subject tires were in compliance with the Federal Motor Vehicle Safety Standards. For each test, state the date of the test, describe the tire tested including model, size, and production date, describe the test (e.g., FMVSS No. 119 with "S" paragraph number) and state the test results. This information request covers a period prior to 2001 if the certification testing occurred before 2001.

Answer: N/A

9. Describe all testing that your company conducted, arranged to have conducted (e.g., by a test laboratory) and or about which your company otherwise had information on the subject tires, other than certification tests identified in your answer to number 8 above. For each test, state the date of the test, describe the tire tested including model, size, and production date, describe the test and state the test results. This information request covers a period prior to 2001 if for subject tires designed and tested before 2001.

Answer: N/A

10. Provide copies of all communications with HZR related to durability and performance of the subject tires.

Answer: N/A

Alexander International, L.L.C.

CUSTOM HOUSE BROKER
INTERNATIONAL FREIGHT FORWARDER
TREASURY DEPT. LIC. # 17260
FMC LIC. # 172NF
I.A.T.A. # 44-52150
IRS # 62-1761307



INVOICE

DUNLAP & KYLE CO., INC.
P.O. BOX 720
HWY 51 SOUTH (EUREKA ST EXIT)
BATESVILLE MS 38606
ATTN: MR. JACK KING

INVOICE NUMBER	INVOICE DATE
NOL529651300	6/01/05
YOUR REFERENCE NUMBER	
HS051005	
PLEASE RETURN A COPY OF THIS INVOICE WITH YOUR REMITTANCE TO	
ALEXANDER INTERNATIONAL DEPT 146 MEMPHIS, TN 38150	

INQUIRIES TO:
4294 SWINNEA ROAD
MEMPHIS, TN 38118
901-367-9400

Hess Tire SW
San Antonio, TX

INV. # 61525
DATE 5-7-05
BILLS

CARRIER MAEU	PORT OF LADING MAERSK STEAMSHIP SINKANG; XINGANG, C	PORT OF UNLADING LOS ANGELES, CA	CUSTOMER NUMBER 206877
COMMODITY DESCRIPTION RADIAL LIGHT TRUCK TIRES		SHIPPER HANGZHOU ZHONGCE RUBBER	BL# / AWB # 502055510
PIECES 600	WEIGHT 11400KG	ENTRY NO. AND DATE 5233382-0 6/05/05	DATE OF EXPORT 5/20/05
		DATE OF IMPORT 5/05/05	FILE NO. 5105233382000
DESCRIPTION OF CHARGES			
			AMOUNT
101 CONSUMPTION ENTRY SERVICE			✓ 175.00
202 EST. DUTIES, TAXES, & FEES			✓ 1325.21
203 INTERNATIONAL FREIGHT CHARGES			✓ 3999.00
TTNU9050525			
C-TPAT IS THE CUSTOMS TRADE PARTNERSHIP AGAINST TERRORISM. A JOINT PARTNERSHIP BETWEEN THE GOVERNMENT AND THE TRADE COMMUNITY TO SECURE YOUR SUPPLY CHAIN. ARE YOU A MEMBER? NO? PLEASE CONTACT US FOR MORE INFORMATION.			
REC'D JUN 09 2005 JUN - 2005			
THIS INVOICE REPRESENTS FUNDS ADVANCED OR PAYABLE ON YOUR BEHALF. PLEASE REMIT YOUR PAYMENT IMMEDIATELY TO AVOID DELAYS AND PENALTIES.			
ALEXANDER INTERNATIONAL HAS A POLICY AGAINST PAYMENT, SOLICITATION, OR RECEIPT OF ANY REBATE, DIRECTLY OR INDIRECTLY, WHICH WOULD BE UNLAWFUL UNDER THE UNITED STATES SHIPPING ACT, 1984.			5499.21
If you are the importer of record, payment to the broker will not relieve you of liability for CBP charges (duties, taxes or other debts owed CBP) in the event the charges are not paid by the broker. Therefore, if you pay by check, CBP charges may be paid with a separate check payable to "U.S. Customs and Border Protection" which shall be delivered to CBP by the broker.			TOTAL U.S. \$

OR check # LF-10241 5-31-05
OR check # LF-10241 5-31-05

H12%
8249

H1510

MAERSK SEALAND

ORTECK INTL

Notify Party (complete name and address)

ALPHA INTL-ESSINGTON
108-D ERRICKSON AVENUE
ESSINGTON PA 19029

ARRIVAL NOTICE

BL No.

MAEU 502055510

WAYBILL

Vessel

Voy. No.

Date

SL ENDURANCE

/0510

Your ref.

Page

1

Place of Receipt

Other numbering identification

XINGANG

Port of Loading

XINGANG

Port of Discharge

LOS ANGELES, CA

Port of Delivery

SAN ANTONIO, TX

V0780551607 IT

FOR IT DATE

USE ARRIVAL

DATE BELOW

TOTAL PKGS:

600

Assignee (complete name and address)

ORTECK INTERNATIONAL,
NC.7917 G-H CESSNA AVE
AITHERSBURG, MD 20879
TEL:240-683-4640
AX:240-683-4644

Shipper/Exporter (complete name and address)

CHINA INT'L FREIGHT CO., LTD
ROOM 802, NO.45, YAN-AN ROAD
EAST, SHANGHAI, CHINA 200002
TEL:86-21-63373535
FAX:86-21-63373788

Container No/Seal No. Marks and Numbers	No. of Containers or pkgs.	Kind of Packages: description of goods	Gross Weight	Measurement
TNU9050525 O/HIGH 9'6 L-CN3733567 1400 KGS	1	CY / CY CONT 600 PIECES TIRES AND/OR FLAPS AS FURTHER DESCRIBED IN PURCHASE ORDERS FROM APPLICANT TO ORTECK INTERNATIONAL INC. SHIPPING TERMS C & F OR FOB AS PER PURCHASE ORDER NO WOOD PACKING MATERIAL IS USED IN THIS SHIPMENT COUNTRY OF ORIGIN: CHINA CC NO.101 ORDER NO. LF-10241	KGS 11400 LBS 25132	
***** FOR TERMINAL AVAILABILITY ON CARGO DISCHARGING LOS ANGELES PLEASE CALL 1-3102214100 CALL STARVOICE 1-8884623775 FOR UP-TO-DATE INFO ON *FREIGHT CHARGES * VESSEL ETA * FINAL DELIVERY * RELEASE STATUS * OR VISIT OUR WEBSITE AT WWW.MAERSKSEALAND.COM FOR TRACKING & SCHEDULES *****				

Freight & Charges	Rate	Unit	Prepaid	Collect
BASE FRT	1.00*	3600.00	PER 40'HC USD	3600.00
B.A.F.		310.00	SURCHG 40H USD	310.00
CARRIER SECURITY CHA		6.00	SURCHG 40H USD	6.00
FUEL CHARGE		50.00	SURCHG 40H USD	50.00
ALAMEDA CORR CHARGE		33.00	SURCHG 40H USD	33.00

EXPRESS MAIL PACKAGES

U.S. MAIL PACKAGES

REMIT TO: MAERSK SEALAND, ATTN: PAYMENT SERVICES
6000 CARNEGIE BLVD., | P.O. BOX 12971
CHARLOTTE, NC 28209 | CHARLOTTE, NC
PHONE 1-800-321-8807 | 28220

TO PREVENT DEMURRAGE ON DOOR DELIVERY, WE MUST RECEIVE
DELIVERY ORDER, DOCUMENTS, FREIGHT, & CUSTOMS RELEASE
BY NOON OF BUSINESS DAY PRIOR TO FREETIME EXPIRATION.

Total amount due

USD 3999.00

The above mentioned cargo is
due to arrive aboard subject
vessel On/for about

Date

JUN 05 05

Estimated Demurrage start

Date

16:00

EST. ARR TIME

Estimated Demurrage start

6/5
324
1222

ENTRY SUMMARY

Payment Due: 061605
H5051005

ALEXANDER INTL LLC - MSY
10 VETERANS BLVD. #206A
ETAIRIE, LA 70005

1. Entry No. HK8 5233382-0	2. Entry Type Code 01 ABI/A	3. Entry Summary Date 739
4. Entry Date	5. Port Code 2704	
6. Bond No. 032	7. Bond Type Code B	8. Broker/Importer File No. 01511M05233382

9. Ultimate Consignee Name and Address	10. Consignee No. SAME	11. Importer of Record Name and Address DUNLAP & KYLE CO., INC. P.O. BOX 720 HWY 51 SOUTH (EUREKA ST EXIT) BATESVILLE MS 38606	12. Importer No. 64-034985600
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ABI Summary Status:
PAPERLESS - FILER RETAIN RECORDS

MS
State

13. Exporting Country CN	14. Export Date 5/20/05
15. Country of Origin CN	16. Missing Documents
17. I.T. No.	18. I.T. Date

19. B.L. or AWB No. MAEU502055510	20. Mode of Transportation 11	21. Manufacturer I.D. CNHANZHDIHAN	22. Reference No.
23. Importing Carrier SL ENDURANCE	24. Foreign Port of Lading 57017	25. Location of Goods/G.O. No. W185 MAERSK LINES (L V/F/T # 510	
26. U.S. Port of Unloading 2704	27. Import Date 5/05/05		

28. Line No.	29. Description of Merchandise			33. A. Entered Value B. CHGS C. Relationship	34. A. T.S.U.S.A. Rate B. ADA/CVD Rate C. I.R.C. Rate D. Visa No.	35. Duty and I.R. Tax													
	30. A. T.S.U.S.A. No. B. ADA CVD Case No.	31. A. Gross Weight B. Manifest Qty.	32. Net Quantity in T.S.U.S.A. Units			Dollars	Cents												
001	RUB. TIRES, LIGHT TRUCK 4011.20.1005	600 PCS 11400	INVOICE 1 RADIALS 600 NO	NOT RELATED 30570 C3999	LF10241 4% .21%	1222.80 64.20													
<p>BLOCK 39 SUMMARY:</p> <table> <tr> <td>MPF</td> <td>499</td> <td>64.20</td> </tr> <tr> <td>HMF</td> <td>501</td> <td>38.21</td> </tr> <tr> <td>TOTAL:</td> <td></td> <td>102.41</td> </tr> <tr> <td colspan="2">TOTAL ENTERED VALUE</td> <td>30570</td> </tr> </table>								MPF	499	64.20	HMF	501	38.21	TOTAL:		102.41	TOTAL ENTERED VALUE		30570
MPF	499	64.20																	
HMF	501	38.21																	
TOTAL:		102.41																	
TOTAL ENTERED VALUE		30570																	

36. Declaration of Importer of Record (Owner or Purchaser) or Authorized Agent		U.S. CUSTOMS USE		TOTALS	
<p>I declare that I am the <input type="checkbox"/> importer of record and that the actual owner, purchaser, or consignee for customs purposes is as shown above. OR <input type="checkbox"/> owner or purchaser or agent thereof.</p> <p>I further declare that the merchandise <input type="checkbox"/> was obtained pursuant to a purchase or agreement to purchase and that the prices set forth in the invoice are true. OR <input type="checkbox"/> was not obtained pursuant to a purchase or agreement to purchase and the statements in the invoice as to value or price are true to the best of my knowledge and belief.</p> <p>I also declare that the statements in the documents herein filed fully disclose to the best of my knowledge and belief the true prices, values, quantities, rebates, drawbacks, fees, commissions, and royalties and are true and correct, and that all goods or services provided to the seller of the merchandise either free or at reduced cost are fully disclosed. I will immediately furnish to the appropriate customs officer any information showing a different state of facts.</p>		A. Liq. Code	B. Ascertained Duty	37. Duty	1222.80
		C. Ascertained Tax		38. Tax	
		D. Ascertained Other		39. Other	102.41
		E. Ascertained Total		40. Total	1325.21

Notice required by Paperwork Reduction Act of 1980. This information is needed to ensure that importers/exporters are complying with U.S. Customs laws, to allow us to compute and collect the right amount of money, to enforce other agency requirements, and to collect accurate statistical information on imports. Your response is mandatory.

41. Signature of Declarant, Title, and Date

ALEXANDER INTL LLC

6/01/05
ATTY-IN-FACT

**ORTECK
INTERNATIONAL, INC.**

7917 G & H CESSNA AVE
GAITHERSBURG, MD 20879
TEL: 240-683-4640 FAX: 240-683-4644
E-Mail: orteksales@orteck.com

Invoice

Priority

Date:	Order #	Factory	Salesman
05/31/05	LF-10241	BCT	Sonny

Bill To: CC# INV. # 61197
D & K TIRE CO.
Dennis King
280 Eureka St, Batesville, MS 38606
662-563-7601
Accounts Payable:

Ship To: 110
CIF PORT LA
Hesselbein Tire SouthWest
Bob Pope
10001 Osgood Dr. San Antonio, TX 78233
210-646-8448

Cust P.O. #	Payment Terms	ETA	Freight	Ship From	Container #
HS051005	Net on Invoice	06/06/05	FOB Collect	CHINA	TINU9050525

FET-20

Qty	Code	Cubes	Weight	Description	Price US\$	FET US\$	Total US\$
400	2085	0.00	16164.00	LT235/85R16 10 Tbls RL-873 BLK	\$ 50.27	\$ -	\$ 20,108.00
200	2086	0.00	8298.00	LT245/75R16 10 Tbls RL-873 BLK	\$ 52.31	\$ -	\$ 10,462.00
				ENTERED			
				VENDOR #			
				INVOICE #			
				INV. DATE			
				DUE DATE			
				AMOUNT			
				DISCOUNT			
				CHKD. BY			
				APPRVD BY			
600		0.00	24462.00		\$ 30,570.00	\$ -	\$ 30,570.00
Special Instructions:				All prices are FOB China/India Port. Ocean Freight, Duty, Customs and clearance will be done and paid by Dunlap & Kyle. Further All F.E.T. and other taxes will be paid by Dunlap & Kyle.			
Total:						\$	30,570.00

Wire to: Bank of America, Baltimore, MD. U.S.A

ABA# 0260-0959-3 Credit A/C# 003931033033 - ORTECK INTERNATIONAL

14.2

All sales are final. No returns or refunds. Payment is due on receipt of invoice. Any shortages and claims must be reported within 72 hours upon receipt of the goods, in writing by certified mail to above address. Buyer indemnifies the Seller against all claims and losses of all kinds.

faxed: 6/1/05

Beijing Capital Tire - Radial
Light Truck Tires

AI # NOL529651300 6-1-05
D+IC# 61525 5-7-05

4X46-2005

DOT 00-21

1004020



873

PL-873

CS 44 88